

Privacy Policy and Cookies Policy

We are collecting and processing your personal data.

Any type of personal data can be used to identify you. It is very important that you keep in mind that sharing your personal data is a responsible activity and increasingly requires you to take precautionary measures as to protect it. **You have the right to remain in full control over your personal data.** This means that you have the right to be made aware of risks, rules and safeguards in relation to the processing of your personal data. You have the right to ask questions about **how** and **why** your data is processed and, if you do not like the answer, you have the right to object to data processing and have your data erased.

As part of our commitment, in the next pages we will explain how we collect, use and protect your personal data, as well as why we are processing your personal data and what are your rights in relation to this processing.

Procivis uses **cookies** to keep our sites reliable, secure and personalised. When you continue to use our sites you accept cookies, this helps us to make the sites (procivis.ch) better by remembering your preferences, customising content or ads.

Most cookies collect general information, such as how visitors arrive at and use our sites, the device they are using, their internet protocol address (IP address), what pages they are viewing and their approximate location (for example, we would be able to recognise that you are visiting our sites from a particular city). We also use cookies to help us understand our audience and to analyse how and which of our sites are used (Google Analytics).

We use cookies to serve you with advertisements, which is sometimes sent directly to your email, that we believe are relevant to you and your interests.

If you do not understand or have further questions regarding the purpose of data processing, before agreeing with it, please reach out to our person responsible for handling your personal data on legal@procivis.ch.

We will limit to the fullest possible extent interference into your right to privacy. We have in place appropriate technical and organisational measures to prevent unauthorised or unlawful access to the personal data you have provided to us. When assessing the appropriate level of security, we take steps to ensure that only qualified and limited number of personnel can access your personal data. Moreover, records of your personal data are protected using state of the art encryption and processed only when necessary.

As complete data security cannot be guaranteed for communication via instant messaging and similar means of communication, we would recommend sending any particularly confidential information only by regular post or e-mail.

1 Procivis and General Data Protection Regulation (GDPR)

Procivis AG is a Data Controller within the meaning of Article 4 (7) of GDPR and Art. 3 (i) of the Swiss Federal Act on Data Processing. If you are a resident of the European Union or other regions with laws governing data collection and use, then you agree to the transfer of your information to Switzerland.

2 You can contact person responsible for handling your personal data

You can send us your questions or request related to any aspect of your personal data either by regular mail (Procivis AG, Tödistrasse 46, 8002 Zurich, Switzerland) or via email to legal@procivis.ch.¹

3 Information you provided to us and how do we process your personal data

We are collecting and processing sensitive personal data about you.² This personal data can be used to uniquely identify you. The processing of this data is necessary for the purposes of carrying out the professional obligations under the relevant regulations. We may also use your de-identified and aggregated data for statistical purpose.

You have the right to withdraw your consent at any time by writing an email to our responsible person. In case of overriding interests that require the processing to continue, we will nevertheless consider your request in good faith and respond to you.

The following information is necessary for the performance of the agreement between parties and can be collected and processed by Procivis AG or entities employed by Procivis to perform these tasks on our behalf, subject to Procivis supervision and obligations derived from this Privacy Policy:

3.1 Personal and Demographic Data:

- Name and Surname
- Date of Birth
- Gender
- Occupation
- Addresses
- Country of residence
- Nationality and Citizenship
- Details of our interactions with you and any records of our communication
- Identifiers we assign to you

¹ The person responsible for handling your personal data is not a Data Protection Officer within the meaning of Art. 37 GDPR even if his tasks coincide with those listed in Art. 38 and 39 GDPR.

² Not within the meaning of Art. 3 (c) of the Swiss Federal Act on Data Processing nor Art. 9 of the General Data Protection Regulation 2016/679 (EU GDPR).

- When you access our Website, data transmitted by your browser will be automatically recorded by our server (such as log files and information collected by Google Analytics)

3.2 Personal contact details:

- Phone Number
- Email Address (when you sign up with your email address to the newsletter or on the Website your email will be used for updates)

Procivis will use your personal data to draft a document called “Personal Profile” which will comprise your personal demographic data, personal economic and social data and personal contact details.

4 Legal basis for processing

We may disclose your information only if legally obliged to do so, when meeting our ongoing regulatory and compliance obligations, including in relation to recording and monitoring communications, disclosures to tax authorities, financial service regulators and other regulatory and governmental bodies, and investigating or preventing crime.

Depending on the purpose of the processing activity, the processing of your personal data will be one of the following:

- Necessary for fulfilling our contractual obligations towards you, without unduly affecting your interests or fundamental rights and freedoms
- Required to meet our legal or regulatory responsibilities
- In limited circumstances, processed with your consent which we obtain from you from time to time (for instance where required by laws other than the EU GDPR or when exercising our rights under Articles 16 and 17 of the Charter of Fundamental Rights), or processed with your explicit consent in the case of special categories of personal data such as your financial information.

5 Purpose of processing

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. In particular, we process personal data for the following purposes:

- Client on-boarding processes, including to verify your identity and assess your application and to conduct legal and other regulatory compliance checks to comply with regulations, and prevent fraud
- Ensuring proper execution by ensuring that we can identify you and make payments or transfers to your accounts;

- Managing our relationship with you, which includes communicating with you in relation to the products and services you obtain from us and from our business partners, handling customer service-related queries and complaints, verifying your identity.
- We use information to provide you with meaningful advertising marketing materials - such as news and information necessary to facilitate the service (your subscription to the Newsletter) or meaningful advertisement that is sometimes sent directly to your email.
- We will notify to you any other purpose from time to time.

To the extent we obtained your consent to process your personal data in the past, we will no longer rely on such consent, but instead will rely on lawful grounds of compliance with a legal obligation, contractual necessity or legitimate interests (as specified in this Privacy Policy), and our ability to rely on that consent is hereby waived or extinguished. For the avoidance of doubt, any consent given for the purpose of our compliance with the regulatory obligations remains unaffected by this paragraph.

6 With whom do we share your personal data?

Your data is shared with qualified employees Procivis AG and our business partners, when obliged by legal requirements the data can be shared with tax authorities or other regulatory or governmental bodies.

7 Your rights

You have a right to ask us to amend or rectify inaccurate personal data we collect and process and the right to request restriction of your personal data pending such a request being considered.

Where we process your personal data on the basis of your consent, you have the right to withdraw that consent at any time. Please also note that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

You have a right to ask us to stop processing your personal data, or to request deletion of your personal data (the so-called right to be forgotten). However, these rights are not absolute and in case of overriding interests that require the processing to continue, we will consider your request and respond to you with the outcome.

When personal data are processed for direct marketing purposes, your right to object extends to direct marketing, including profiling to the extent it is related to such marketing. You may object to direct marketing by clicking the "unsubscribe" link in any of our emails to you, or by emailing us.

Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you have the right to request your personal data be transferred to you or to another controller (the so-called data

portability). You also have the right to ask Procivis AG for a copy of some or all of the personal data we collect and process about you.

In certain circumstances, Procivis AG may process your personal data through automated decision-making, including profiling. Where this takes place, you will be informed of such automated decision-making that uses your personal data, be given information on the logic involved, and be informed of the possible consequences of such processing. In certain circumstances, you can request not to be subject to automated decision-making, including profiling.

8 Who can access your personal data?

Your personal data will be shared with employees and agents of Procivis AG.

If required, we disclose personal data to public authorities, regulators or governmental bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so.

If you are not satisfied with Procivis' response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen.

9 Assignment of rights

In case of reorganisation, in particular when the respective is registered and some rights and obligations transferred, or sell of business, personal data will be shared so that you can continue to receive products and services. Procivis AG will take steps to ensure such potential purchasers keep the data secure.

10 How long do we store your personal data?

Procivis AG will retain personal data for the period of your relationship or contract with Procivis AG. An ongoing or anticipated legal or regulatory proceeding may lead to retention beyond this period.